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4 Attorney for Defendant Han Nam Corporation

5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE
7 NORTHERN MARIANA ISLANDS

8 ZHAI LAN JIANG,

CIVIL ACTION NO. CV-07-0035

9 Plaintiff,

10 DEFENDANT'S CASE MANAGEMENT
11 CONFERENCE STATEMENT

12 -v-

13 HAN NAM CORPORATION,

14 Defendant.

15 COMES NOW, Han Nam Corporation, defendant in the above entitled action, by and
16 through its undersigned counsel, to provide the following Case Management Conference
17 Statement:

18 a. All parties have been duly served.
19 b. This Court has jurisdiction over this case pursuant to 42 U.S.C. § 2000e-5 and
20 42 U.S.C. § 1981a(a)(1) and 28 U.S.C. §1331 (Federal Question Jurisdiction)
21 and 28 U.S.C. §1337(a) (Proceedings arising under any act of Congress
22 regulating commerce) and supplemental jurisdiction over claims for breach of
23 contract raised within the complaint and venue is properly set in this
24 jurisdiction.

c. Defendant anticipates filing motions as follows:

1. Motion for summary judgment or partial summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure;

2. Motion to exclude documents related to EEOC investigation, findings and correspondence related to settlement discussions entered therein.

d. Defendant does not anticipate any special procedures required.

e. No modifications of standard pretrial procedures are necessary.

f. Settlement prospects are unknown.

g. Defendant recommends that this case be scheduled on an regular track pursuant to LR16.2CJ(c).

DATED this 3rd day of January, 2008.

/ s /

STEPHEN J. NUTTING
Attorney for Defendant